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VIA ECF

Honorable Colleen McMahon
United States District Court for the
Southern District of New York
500 Pearl Street
New York NY 10007

Re: Sillam et al. v. Labaton Sucharow LLP et al., No. 21 civ. 6675 (CM)(OTW)

Dear District Judge McMahon:

This office represents the Plaintiffs in the above referenced matter. We write to respectfully object Magistrate Judge Ona T. Wang's recent order dated April 22, 2024, pursuant to Fed. R. Civ. P. 72. (ECF 143).

The objection asserts that Plaintiff Gérard Sillam ("Sillam") acted in good faith based on the advice of his former counsel, Douglas Reda, regarding the interpretation of Sillam's declaration dated February 16, 2023 (the "Declaration"). Sillam's trust in Reda led him to believe that initiating criminal proceedings in France would not breach the Declaration's terms. Furthermore, it points out that the interpretation of the Declaration has been incorrect, as the document was intended to restrict Sillam from making any criminal complaints against the Defendants specifically in relation to the taking of his deposition in France. Additionally, the objection underscores the substantive nature of Sillam's legal proceedings in France, refuting any notion of frivolity or ill intent.

We respectfully request the court to reconsider any sanction imposed on Sillam. Thank you for considering our request for extensions. Should the Court require any further information or clarification, please do not hesitate to contact us.

Respectfully submitted,

/s/ Yen-Yi Anderson
Yen-Yi Anderson